

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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MICHAEL O'LEARY as Administrator Ad Prosequendum for the Estate of Shawn Patrick O'Leary, Deceased	:	
	:	
	:	
vs.	:	NO:2-16-CV-01393
	:	
WEXFORD HEALTH SOURCES, INC.; RAUL YANKELEVICH, M.D.; STEPHEN RITZ, D.O.	:	JURY TRIAL
	:	DEMANDED
	:	

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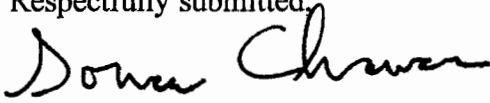
**Motion for Reconsideration**

Per court Order entered on November 20, 2019, Sonia Perez Chaisson, esquire, respectfully moves for reconsideration of that Order as directed by the Court, and respectfully states as follows;

1. I respectfully apologize to Magistrate Rice, for my behavior during the November 2019 telephone conference. It was not my intention to offend anyone, and as soon as I realized Magistrate Rice was offended, I immediately apologized and am doing so again.
2. I also, respectfully apologize to the Honorable Judge Padova for my behavior in any telephone conferences where I interrupted him.
3. While it is not an excuse, I have recently suffered the deaths of two family members which has caused me great distress.
4. I respectfully request the Court reconsider its November 20, 2019 order, and allow me to continue representing plaintiff Michael O'Leary in this matter. Additionally, Mr Michael O'Leary desires that I continue to represent him in this case. By way of further explanation there has been a great deal of animosity between Michael O'Leary and attorney John L. Rollins, and I have been advised by Mr. O'Leary that he has discharged Mr. Rollins, See Rule 1.16(a)(3).
5. Mr. O'Leary has advised that he consulted other Pennsylvania counsel but wishes me to remain as counsel as I'm thoroughly familiar with the case.

6. It has been noted that the court has entered a fine against me. I respectfully request that the court reconsider the amount of the fine, or grant me additional time to pay the fine.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sonia Chaisson". The signature is fluid and cursive, with the first name "Sonia" and last name "Chaisson" clearly distinguishable.

/S/Sonia Perez Chaisson ,  
Esquire

cc Kenneth Powell, Jr,  
Esquire

John L. Rollins, Esquire

# **SONIA PEREZ CHAISSON THE LAW OFFICES OF SONIA PEREZ CHAISSON**

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**November 25, 2019**

United States District Court for the Eastern District  
US Courthouse  
Attn: Clerk of Courts  
601 Market Street, Room 17613  
Philadelphia, PA 19106

**Dear Clerk of Courts:**

Per the Order of the Honorable Judge R. Padova dated November 20, 2019, I am enclosing a Motion for Reconsideration. I attempted to file it online, however I was informed that as long as my Pro Hac Vice is inactive is not possible to access the online filing system,. I was directed to file it with you. Please contact me if you have any questions. Thank you for your time,

**Sonia Perez Chaisson, Esquire**